



Employment Development Department

INFORMATION BULLETIN

JOB TRAINING PARTNERSHIP ACT

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TO: SERVICE DELIVERY AREA ADMINISTRATORS
PRIVATE INDUSTRY COUNCIL CHAIRPERSONS
JTPD PROGRAM OPERATORS
EDD JOB SERVICE OFFICE MANAGERS
JTPD STAFF

SUBJECT: SDA ADMINISTRATORS' QUARTERLY MEETING SUMMARY

A summary of the December 11, 1998, Service Delivery Area (SDA) Administrators' Quarterly meeting is attached.

If you have questions or comments regarding the summary, please contact Jackie Owen at jowen1@edd.ca.gov or (916) 654-8006.

/S/ BILL BURKE
Assistant Deputy Director

Attachments

SERVICE DELIVERY AREA ADMINISTRATORS' QUARTERLY MEETING

Westin Horton Plaza
910 Broadway Circle
San Diego, CA 92101
Friday, December 11, 1998

Agenda

8:00 a.m.	Welcome/Hot Topics	Bill Burke, Job Training Partnership Division
8:30 a.m.	One-Stop Collocation	Chuck Horel, Business Operations Planning and Support Division
9:00 a.m.	Workforce Investment Act of 1998	Vicki Johnsrud, Workforce Investment Transition Division
10:30 a.m.	Break	
10:45 a.m.	JTPA Closeout	Bill Burke
11:15 a.m.	Welfare-to-Work Update <ul style="list-style-type: none">• Reporting• Referrals• Capacity Building	Bill Burke
Noon	Lunch on Own	
1:00 p.m.	Welfare-to-Work (continued)	Bill Burke
2:15 p.m.	Open Discussion	All
3:00 p.m.	Adjourn Meeting	

SERVICE DELIVERY AREA ADMINISTRATORS' QUARTERLY MEETING SUMMARY

Westin Horton Plaza
San Diego, California
Friday, December 11, 1998

Welcome/Hot Topics

- Administration Transition

There is no information available from the Governor's Office regarding new administration appointments relative to employment and training. The Employment Development Department (EDD) has received requests for program information from the Governor's Transition Team.

- Senate Bill (SB) 645

Liz Clingman, Job Training Partnership Division (JTPD), reported that the State Job Training Coordinating Council (SJTCC) Performance Based Accountability (PBA) Committee will meet in San Diego on December 17, 1998, to discuss the draft version of California's performance report for program year (PY) 1995-96. The report is expected to be released in January 1999. Because the report is voluminous, JTPD will receive CD ROM disks rather than hard copies. Further discussions between SJTCC and JTPD staff will be held to determine the most appropriate method of disseminating the report.

- Title III Update

Currently there is approximately \$2 million in the Title III 40 percent Governor's Discretionary account. The administrators were requested to report to the state as early as possible in January any unused Title III 40 and 60 percent funds in order that they may be reobligated to other areas thereby eliminating the need to request national reserve funds from the Department of Labor (DOL). The JTPD program managers will be contacting the Service Delivery Areas (SDA) in January for any possible deobligation of 40 and 60 percent funds. The administrators were encouraged to be proactively thinking about their current, upcoming, or additional program funding needs for the remainder of the year; they were asked to contact their assigned program managers with this information.

- PY 1998-99 Local Allocation Shares

Liz Clingman reported that while the federal budget had passed, DOL does not have Job Training Partnership Act (JTPA) program allocation figures available for the state. Estimates from the Interstate Conference of Employment Security Agencies approximate that California's funding will be equivalent to last year's for Title II and slightly up for Title III.

It was hoped that by utilizing the state's preliminary unemployment statistics that local area allocations could be estimated and shared at the meeting. However, because California is no longer considered an area of substantial unemployment (6.5 percent unemployment rate by law), the Labor Market Information Division is in the process of remapping the state which will likely take until the end of December 1998 to complete. The JTPD expects to release allocation figures in February 1999.

One-Stop Collocation

Chuck Horel, Dick Meadows and Walter Bakke, Business Operations Planning and Support Division (BOPSD), provided an update on the facility code requirements for the one-stop collocation sites relative to seismic, asbestos, and Americans with Disabilities Act requirements. These code requirements must be met prior to execution of any state lease of a building which houses state employees. A handout was provided delineating cost guidelines for facility code requirements for the EDD/one-stop partner locations based on the term of the lease. Walter Bakke recommended that the SDAs involve the field office division chiefs early on in their site selection process to help determine occupancy/premises readiness.

Chuck Horel reported that collocation projects to date total 104. Of the 104 projects, 11 are complete and 93 are in progress. The next quarterly report will be mailed to the SDAs by mid-January.

The SDAs agreed that a status report providing them with information regarding who BOPSD is working with and on what projects would be helpful.

The SDAs raised concern regarding the 270-day time frame needed to complete a one-stop partnership, beginning with the kick-off meeting and formulation of an agreement through execution of the lease document. Chuck Horel responded that the most complex obstacle to finalizing lease agreements has involved compliance issues. The BOPSD has developed procedures that will now help ease the certification, compliance-related issues. The SDAs were encouraged to consider newer or recently constructed buildings for partnership premises sites as these buildings generally have fewer compliance issues.

Chuck Horel added that typically EDD would not expect a one-stop partner to incur rent expense until the time the partner takes occupancy, nor would EDD be expected to begin a lease payment stream until such time that EDD takes occupancy. However, if EDD staff occupy space in which the one-stop partner has primary lease responsibility, EDD is willing to pay rent, but not retroactively.

Stephanie Klopffleisch, Los Angeles County SDA, proposed the formulation of an active, dedicated team comprised of key state departmental players to streamline the one-stop lease negotiation process.

Sue Cleere Flores, Los Angeles City SDA, questioned whether JTPD was reviewing the JTPA 90-day allowable cost guidelines relative to vacant space and suggested the state be proactive and change the cost guidelines to prevent findings.

Keith Lee, San Bernardino County SDA, asked that the SDA administrator be notified when the BOPSD facilities team visits an SDA.

Workforce Investment Act (WIA) and Discussion

Kathy Castillo, Workforce Initiatives Office, provided a brief update on WIA activities occurring at the state and national levels. The draft planning guidance and regulations were distributed December 10, 1998, by the National Governors' Association. If DOL does not post the draft planning guidance and regulations on their web site, Kathy will work with SJTCC to ensure they are posted on their web site.

The DOL town hall meetings are taking place December 11-18, 1998. The DOL will distribute the draft planning guidance and regulations at these meetings as well as discuss their implementation process, review the planning guidance and regulations, and take public comments. Those unable to attend the meetings can post comments on DOL's web site at <http://usworkforce.org>. The final regulations are due to Office of Management and Budget on January 8, 1999.

Two spot bills were introduced December 7, 1998, to implement WIA in California—SB 43 introduced by Senator Johnston and SB 88 introduced by Senator Escutia. The SB 43 proposes to move SJTCC or the newly formulated Workforce Investment Board to the Governor's Office, proposes to move the Employment and Training Panel to the Trade and Commerce Agency, and states that the Governor's State Plan is to be used as a framework to develop a unified plan, including Carl Perkins, adult education, Wagner-Peyser, older americans, etc. The SB 43 also includes the provisions of the Regional Workforce Preparation Economic Development Act to fund and operate regional collaboratives, minus the state planning provisions. Senator Johnston has proposed forming a task force; hearings will take place in January.

Liz Clingman and Ray Worden, Long Beach SDA, shared their perspective on the meetings they attended in Washington, D.C., regarding performance measurement and accountability under WIA. The November 17 meeting dealt with technical issues; the December 1-2 meeting related to WIA policy. The DOL designed the meetings to allow a forum for discussion of the issues and not to build consensus and recommendations. Consequently, it is not clear how DOL will apply the advice received; however, we do not expect that performance accountability will be dealt with in the regulations. Policy guidance will be issued after completion of the regulations.

Discussion in the meetings revolved around the following issues:

- Which of the required performance measures should be linked to which services?
- At what point on the service continuum should a client be enrolled?
- How do we address the differences in the "data collection capacity" among states (differing worker coverage in the unemployment insurance base wage file)?
- What should the negotiation process with states be and what should be considered in setting expected levels of performance?
- What is DOL's role with respect to customer satisfaction and continuous improvement?
- How do sanctions, incentives, and continuous improvement fit together?

The DOL promised a concept paper that provides the federal perspective on these issues and considers the comments received. We will have an opportunity to provide further comment on these issues as they relate to that document.

Liz added that DOL is not only looking at effectiveness but efficiency and may include a cost effectiveness measure in the performance structure.

Robert Bloom, Solano County SDA, asked what the present focus is in the Workforce Investment Transition Division prior to having implementation instructions from DOL. Kathy Castillo responded that the SJTCC forwarded a letter to Governor-elect Gray Davis raising the importance of appointing the state's workforce investment board. The letter recommended that this be accomplished by executive order.

Attached are issues identified by the DOL Youth Technical Workgroup that met in Washington, D.C., on December 7-8, 1998.

Al Tweltridge, Department of Education, informed the administrators of a document soon to be mailed entitled the *Workforce Career Development Model* which career development specialists can use as a resource. A 50-page document containing policy recommendations on the California workforce development system will be posted at www.regcolab.cahwnet.gov for public comment.

JTPA Closeout

The JTPD will issue an information bulletin listing issues, providing possible recommendations, and soliciting suggestions from the administrators on how best to proceed with closeout and relay that information to DOL as a state position. The DOL has not provided direction on transitioning JTPA funds for program closeout.

Welfare-to-Work (WtW) Update

- Reporting—The Department of Health and Human Services (DHHS) interim regulations were published in the *Federal Register* October 28, 1998, and can be downloaded from the DHHS web site at www.acf.dhhs.gov/news/welfare/. The 60-day public comment period will end December 28, 1998.

The DHHS interim regulations require that the states collect data on a monthly basis and report expenditures on a quarterly basis by participant, allowable activity, and month. The interim regulations provide the option to collect the required data on a sample basis. The JTPD is exploring the best approach to accomplish collection of the required data. The state is committed to minimizing the impact of this requirement at the state and local levels while still meeting the federal reporting requirement. A suggestion was made that since DHHS is implementing a database collection system in the counties, why not include the WtW-required reporting elements and share the information. An additional suggestion was made that Ray Remy, EDD Director, send a letter to the DOL National Office communicating the inflexibility of the reporting

elements and request a waiver on some of the regulatory requirements. The JTPD is in the process of designing a preliminary training course to address reporting issues.

- Referrals—Bob Hermsmeier, JTPD, provided a summary of the WtW survey responses received from the SDAs. The survey was used to gather information on the referral process relating to coordination and enrollment issues with the County Welfare Departments.
- Capacity Building—Kim Hemmer, Golden Sierra Consortium, reported on the activities of the Capacity Building Workgroup. The workgroup identified the following three priority areas of needed WtW training: CalWORKS 101 Training, Marketing and Education to Employers, and Best Practices. Also, Bruce Stenslie, Ventura County SDA, and Andrew Muñoz, Orange County SDA, have joined the workgroup. Kim added that while the California Workforce Association proposal presented to the state and deferred to the JTPD Capacity Building Unit requires additional effort on the part of the state, SDAs, and local partners to develop training modules, state action on the proposal is very much overdue. The JTPD is in the process of securing approval from the director's office on the level of resources to commit to this effort.

Open Discussion

Bob Hermsmeier informed the administrators that the DOL National Office is rapidly establishing a dedicated 800 number for displaced workers to call that will have a referral back to the local level.

The meeting adjourned at 2:20 p.m.

Youth Technical Workgroup: Comments on Preview Regs

**Marriott Wardman Park Hotel
Washington, DC
Dec. 7 - 8, 1998**

P 68 Question 1. Youth Programs and One Stop Centers

Universal Access: Regs not clear that a non eligible youth (16 yrs old, OSY) can access a one stop center.

Concerns: Aligning universal access with eligibility requirements, by mentioning eligibility it implies that there is an eligibility requirement to access the core services of a one stop center. Regs should state that Board has discretion to ensure universal access to core services by all citizens, adult and youth.

Need to ensure capacity for all youth to access potential job shadowing opportunities in the one stop center which may be listed by employers; has implications for access to jobs for summer programs or for access by summer youth participants

Can use Wagner-Peyser funds to pay for non-WIA eligible youth

Recommend a technical amendment to the adult section to clarify youth access to One Stop Core Services.

Page 18: Question 22(b) One Stop Partners

Add definition for comprehensive, or delete the word. This is the first time it has appeared anywhere.

Page 20: Question 23(b)(2):

"...Under WIA, ...Job Corps, ...are required one stop partners." Concern with Job Corps on LWIBS where there is no Job Corps Center in a State. Response was could be Job Corps recruiters, intake counselors etc.

Recommend that language be added to clarify that Job Corps and others shall be members of the LWIB, as *appropriate*.

December 9, 1998

Page 25: Question 30(b)

This listing is missing the 3rd option, has competitive, consortium with LWIB agreement, and ...

P 68 Question 1 cont.

First line references youth programs: unclear who or what this refers to,

Recommend: Rewrite to say... "youth activities funded under Title I..."

P 68 Question 2: Youth Council relationship to local boards

(b) Need to pluralize chief elected official (s) to recognize multi-jurisdictional areas. Example, A Texas county Mayor has delegated authority for youth programs to a local judge. The Judge would work with the Mayor to identify the council members. Would need to be consistent throughout the regulations.

Recommend: Pluralize chief elected official(s) to recognize multi-jurisdictional areas.

(c) Concern with over representation of Board members on Youth Council. Size will also be an issue here and with Local Boards, need to limit the size of the board; concern that size could also encourage Gov to designate PICs as Workforce Boards

Recommend: Technical Amendment limiting the size of the Board or option to grandfather PICs if they have appropriate representation.

P 73 Question 5: Who is eligible for youth services?

Delete quotation marks from - low income individuals

Concern that individuals with disabilities not eligible for youth services. Reference WIA Section 25(f) of Definitions. This section states that individuals with disabilities may be considered low income eligible if stated so in Regs and meet the criteria for cash assistance and family income for six months prior to application does not exceed the poverty line or 70% lower living standard. Concerns with potential duplication of services between WIA and amendments to Voc Rehab.

Recommend regulations to allow individuals with disabilities to eligible as low income individuals. **Or** recommend addressing under sixth barrier.

Recommend: Add a note that Non-income eligible youth can access core services.

December 9, 1998

P 71 Question 6: Requires additional assistance...

Recommend change word "eligibility" on top of page 71 to "barrier."

Clarify the following: That State develops parameters and policy; Local level will develop and define this barrier. Give local level first option to define this barrier consistent with the State plan, and in the absence of a local definition, have State define.

Recommend reordering the last two sentences of this paragraph.

P 71 Question 8: Free and Reduced Lunch Eligibility

A great deal of concern expressed stating that youth currently served under JTPA will be negatively affected if the System is not able to serve those youth identified through free or reduced lunch programs. Concern that eliminating this option is not customer friendly. If service providers can access youth already identified through free and reduced lunch it eliminates the need for youth to ask parents to bring pay stubs to validate income eligibility; and removes negative attention on the youth who is targeted as a low income individual.

Florida has experienced a cost savings by reducing the documentation burden to a one page document signed by school district and parent with a birth certificate.

Recommend: A technical amendment to allow free and reduced lunch to serve as a proxy for income eligibility. Also suggest we decouple this eligibility criteria to request free lunch program serve as an indicator of eligibility, and not free *and* reduced lunch.

Recommend: Allow free and/or reduced lunch eligibility to include youth and other family members.

Recommend: Consider similar eligibility requirements across programs. For example that individuals and their families who receive TANF and live in public housing would be considered income eligible for youth services based on these conditions.

P 72 Question 9: What is an OSY:

Why is youth at-risk no longer included as an out of school youth?

Recommendation: Need to address length of time a youth is not in school to be considered out of school

P 72 Question 10: Is a youth attending an alternative school a drop-out?

Recommendation: A technical amendment stating that youth in alternative schools are identified as OSY.

P 72 Question 12: Program Design

(a)(2) - Concern that the service strategy focuses on "...an employment goal..." which may not be an age appropriate goal for youth aged 14-15/16. A more appropriate goal would include identifying a career path, or engaging in career awareness.

Recommend changing the language to "... identifying a career path" or "engaging in career awareness".

(a)(3): Does the term intermediary organization need to be defined?

Recommend: Allowing local areas the flexibility to define intermediary organization for themselves.

(c)(5): Recommend Adding "other local city or county initiatives."

(c): Recommend add an item 6 including "local employer representatives".

P 74 Question 13: Program Elements

Add the following language:

(a)(1): following secondary school completion add "and attainment of GED".

(a)(3): add the following language "...linked to academic ~~and~~ occupational learning, *and work-based learning*".

(b) add "individual" before objective assessment

P 75 Question 15: What are Supportive Services

Recommendation: Add the following language "...supportive services for youth *including defendants* may include..."

(e): Recommend: Expanding medical services to include "dental and optical services, "for other than work-related items. For example, if an individual needs glasses to learn to improve their reading this need is not tied directly to a work activity.

Recommend: Add "food and appropriate work attire" as a supportive service. This would assist an individual needing help with a suit or dress for a job which is different than purchasing a uniform.

P 76 Question 16: What is follow-up

The way it reads now it appears that only leadership development and supportive services are allowable follow-up activities. However, if training is included as a follow-up service, this raises the question of eligibility determination for follow-up.

Recommend stating: "Follow-up services may include *allowable activities, as appropriate*.

There was a concern expressed about the lack of a maximum time limit for follow-up services as it relates to record keeping. The concern is with the need to store participant files for those who may "never" be terminated from the program.

Recommend We delete the term maximum time limit, it causes confusion.

May consider re-ordering this section to state that follow up is required, that it includes allowable activities, including leadership development and supportive services; and that there is a minimum time limit of 12 months, as appropriate.

Will need guidance on follow-up services for summer, are they different than year round services? Concerned with expense of follow-up services for such a short term intervention.

Recommendation: A Guidance Letter on how to track participation, termination and follow-up activities and services.

Page 77 Question 18: IT As for Youth

Concern with not being able to use an ITA for a youth under the age of 18. ITAs are an element of occupational training, which is not defined. There is also no definition of ITA that excludes the use of ITAs for occupational training for youth.

Recommend allowing for local definition and flexibility in use of ITA's for occupational training activities.

P 78 Question 20: Wages for Private Sector Work Experience

(d): Concern with wording of work experience to benefit the youth and not for the benefit of the employer. Question with who determines benefit, and realization that any work experience activity, whether for an adult or youth, will benefit the employer as well as the individual.

Recommend: Drop the last half "... and not for the purposes of benefitting the employer."

Recommend: Adding language that work experience may lead to part-time or full-time employment as appropriate or as consistent with the individual's service strategy.

Recommend: Clarifying that work experience is an allowable activity in the public sector.

Recommend: It may be useful to adopt the TANF definition which identifies those in work experience as volunteers. Thus avoiding any issue with worker's compensation and insurance.

P 80 Question 23: Youth Opportunity Grants

Good use of language on urban/rural.

Recommend: Add minimum criteria for eligibility.

Recommend: Suggesting language be added to the SGA that "Preference will be given to proposals that build on the goals of a one-stop system."

Question 24: Eligible Youth Opportunity Grants

Recommend: Suggestion for the SGA - Require coordination between Feds and Local Board in an entity applies for a grant which is not a local board.

How does the EZ/EC community fit with the local board?

How is poverty data collected? No reference to census data, not tied to Block Number Areas or census tracts.

Recommend using alternative data sources and not relying on census tract data only, this is too restrictive.

P 80 Question 27: Summer Program Activities

Recommend changing "Project-based learning" to "work-based learning". There is an assumption that project based learning activities are not educational or workrelated.